

# **Department of Energy**

Ohio Field Office Fernald Area Office

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OCT 0 9 2001

Mr. Paul Pardi, Hazardous Waste Group Leader Ohio Environmental Protection Agency 401 East 5th Street Dayton, Ohio 45402-2911 DOE-0023-02

Dear Mr. Pardi:

SUBMITTAL OF CROSS-REFERENCE INDEX PURSUANT TO THE DIRECTOR'S FINAL FINDINGS AND ORDERS FILED JUNE 6, 1996: FINAL MULTI-COMPLEX IMPLEMENTATION PLAN

Reference:

Letter and Director's Final Findings and Orders (DF&O), Thomas E. Crepeau, OEPA to Phil Hamric, U. S. DOE and John Bradburne, FERMCO, dated June 6, 1996.

In accordance with Section V, Order #2 of the referenced Director's Final Findings and Orders, attached is a cross-reference index of Hazardous Waste Management Unit (HWMU) closure components and CERCLA documents for those HWMUs identified in Attachment A of the DF&O. The index links specific components of Ohio Environmental Protection Agency's (OEPA) Closure Plan Review Guidance for RCRA Facilities related to substantive closure requirements with the appropriate CERCLA document which addresses those components. The list is cumulative and provides page numbers and sections for those CERCLA documents that have already been submitted.

Section V of the DF&O requires the FEMP to provide an updated copy of the cross-reference table following the submittal of a referenced CERCLA document. The <u>Final Multi-Complex Implementation Plan</u> was submitted to Ohio and U.S. EPA on October 3, 2001. The specific references to this document in the cross-reference table have been highlighted.

If you have any questions regarding this matter, please contact Ed Skintik at (513) 648-3151.

Sincerely,

David R. Kozlowski Associate Director

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#### Enclosure:

cc w/enclosure:

R. V. Holmes, Fluor Fernald, Inc./MS3 T. A. Poff, Fluor Fernald, Inc./MS65-2 M. Stevens, Fluor Fernald, Inc./MS44-0 AR Coordinator RCRA Operating Record

cc w/o enclosure:

J. Saric, USEPA-V, SRF-J

T. Schneider, OEPA-Dayton

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	FINAL Certification Design Letter for Area 1, Phase II, October 1999	Sludge Drying Beds (41): Section 4.1, Certification Design, pp. 4-1 to 4-5; Section 4.3, Sampling, pp. 4-6 to 4-7
9. Description of Removal Efforts and	OU1 FINAL Remedial Design Documents	Removal and Handling of Waste Pit Waste - Waste Pit 4 (27), Waste Pit 5 (42):
Treatment Processes (Closure Guidance	Package, August 1998	Volume 2, Excavation Plan
Item 3.15)	OU1 FINAL Remedial Action Documents	Processing of Waste Pit Waste - Waste Pit 4 (27), Waste Pit 5 (42):
	Package, April 1999	Operations and Maintenance (O & M) Plan for Remediation Facilities
:	OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement	Removal and Treatment of Waste in HWMU:  To be Submitted for Each D&D Complex (where applicable)
	OU5 FINAL Feasibility Study Report, June 1995	Evaluation of Technologies and Process Options: Section 3.3, p. 3-5
	OU5 FINAL Sitewide Excavation Plan, July 1998	Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F, Implementation of Construction; Appendix I, Sitewide Extent of Contamination by Constituent
	OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation	Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material:
	Areas	To be Submitted
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41):  Management of Sludge: Section 3.3, Material Disposition Sampling Plan, p. 3-3;  Management of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36):  Section 3.2.2, Concrete, Asphalt Pads, Roadways and Floors, pp. 3-9 to 3-10; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3-19
<ol> <li>Landfill Closure Requirements – (if applicable)<sup>3</sup> - (Closure Guidance Item 3.16)</li> </ol>	OU1 FINAL Record of Decision, January 1995	ARARs: Relevant and Appropriate as some remedial alternatives may require closure to these standards  Tables B-28 and B-29
	OU1 FINAL Remedial Design Work Plan, June 1995	Revised ARARs: Tables A-24 and A-25
	OU5 FINAL Record of Decision, January 1996	Not Applicable, if Remediation Levels for Soil and Groundwater are Sufficient for a Clean Hazardous Waste Management Unit Closure <sup>1</sup> :  ARARs: Table B-3, p. B.3-10



CROSS-REF	ERENCE INDEX FOR FEMP HWMU	CLOSURE PLAN COMPONENTS UNDER CERCLA
CLOSURE PLAN COMPONENT <sup>1</sup>	CERCLA DOCUMENT	CROSS REFERENCE INDEX
Landfill Closure Requirements – (if     applicable) <sup>3</sup> - (Closure Guidance Item .16)     - Continued	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific Landfill Closure Requirements:  To be submitted (if applicable)
	Area 1, Phase II Integrated Remedial Design Package, September 1998	Sludge Drying Beds (41): Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.
	FINAL Implementation Plan for Area 3A/4A, May 2001	Storage Pad North of Plant 6 (36): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.
11. Certification (Closure Guidance Item 3.18)	OU1 Remedial Action Report	Certification Sampling Results:  To be Submitted
	OU3 Project Completion Reports	Summary of HWMU Remediation Activities/Statement of Conformance with Requirements and Performance Standards:  To be Submitted for Each D&D Complex
	FiNAL Plant 1 Complex - Phase 1 Project Completion Report, December 1997	Plant 1 Storage Bldg. – Bldg. 67 (25): Section 2.1.3, pp. 7 to 8
	FINAL Thorium/Plant 9 Complex Project Completion Report, April 1999	Plant 9 Warehouse - Bldg. 81 (35): Section 2.2.11, pp. 12 to 14
	FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999	Trane Incinerator (28); UNH Tanks – Raffinate Bldg. (50)
	FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 2.3, pp. 3 to 5  KC-2 Warehouse – Bldg. 63 (34) Section 2.4, pp. 5 to 6
	FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #464 Completion Report, December 2000	UNH Tanks - NFS Storage Area (46):  Section 2.0, p. 1, Component-Specific Remediation Summary; Section 2.5, HWMU No. 46  Decontamination, p. 4
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CLOSURE PLAN COMPONENT	CERCLA DOCUMENT	CROSS REFERENCE INDEX
Certification (Closure Guidance Item 3.18)     Continued	OU5 Certification Reports for Individual Remediation Areas:	Area/Phase-Specific Certification Reports:  To be Submitted
	FINAL Certification Report for Area 1, Phase II, October 2000	Sludge Drying Beds (41):  Section 2.1.5,3, Sector 3 Certification Units, pp. 2-9 to 2-11; Section 2.3, Statistical Analysis, pp. 2-12 to 2-13; Section 3.1, Excavation Activities, p. 3-1; Section 3.2, Changes to Scope of Work, pp. 3-3 to 3-5; Section 5.2, Sludge Drying Bed HWMU Closure, p. 5-3
	OU5 Remedial Action Report	Summary of Remedial Activities and Statement of Conformance with Requirements and Standards:  To be Submitted
12. Status of Facility (or Unit) After Closure (Closure Guidance Item 3.19)	OU1 FINAL Record of Decision, January 1995	Status of Waste Pits After OU1 Remedial Action: pp. 10-1 to 10-9
	OU3 FINAL Record of Decision for Interim Remedial Action, June 1994	Status of Production Area HWMUs After OU3 Remedial Action: Section 5.4, p. 11
·	OU3 Final Record of Decision for Final Remedial Action, September 1996	Integration of the Interim and Final Remedial Actions, Section 2.1, p. 9
	OU5 FINAL Record of Decision, January 1996	Status of FEMP After Soil and Groundwater Remediation: Section 4.0, p. 4-1
	OU5 FINAL Sitewide Excavation Plan, July 1998	Certification Reports: Section 7.4, pp. 7-10 to 7-14
	OU5 Certification Reports for Individual Remediation Areas	Status of those HWMUs That Had Soil Contamination After Soil Remedial Action: To be Submitted

<sup>&</sup>lt;sup>1</sup> Closure Guidance Items are from the Closure Plan Review Guidance for RCRA Facilities, Ohio EPA, March 1999.

Ohio EPA has two options for clean closure where there are no more RCRA requirements (i.e., no post-closure requirements) for the existing HWMUs: (1) complete removal of waste and impacted environmental media, and (2) complete removal of waste and impacted environmental media to health-based standards (known at the FEMP as Final Remediation Levels, FRLs). Post closure requirements will, however, be applicable to the CERCLA on-property disposal cell as it will take some soil and debris contaminated with RCRA-hazardous waste [see Post Closure Care and Inspection Plan, On-Site Disposal Facility (20100-PL-010, Rev. 1, July 1997)].



The perched water contamination has many sources, only some of which are the HWMUs. Because of this, it is difficult or impossible to identify the degree to which a HWMU may have contributed to perched water contamination. Therefore, the nature and extent of contamination in the perched water, and the most appropriate remedial action method and objectives, are best achieved under the CERCLA process alone.